

Mr. Mike Baumhardt
Senior Manufacturing Technician
Wells Manufacturing Corporation
P.O. Box 70
Fond du Lac, Wisconsin 54935

MIG-12

Re: Land Disposal Restrictions
Wells Manufacturing Corp.
WID 980 994 677

Dear Mr. Baumhardt:

On June 5, 1991, the Wisconsin Department of Natural Resources (WDNR), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced Facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 spent solvents and dioxin-containing wastes became effective on November 8, 1986; for California List wastes on July 8, 1987; First Third wastes on August 8, 1988; Second Third wastes on June 8, 1989; and Third Third wastes on May 8, 1990, (40 CFR Part 268 and revisions to 40 CFR Parts 260-265 and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in compliance with the requirements. A copy of the inspection report is enclosed for your records.

If you have any questions regarding this correspondence, please contact Sharon R. Travis of my staff at (312) 896-6533.

Sincerely yours,

Paul E. Distock, Chief
IL/MI/NI Enforcement Program Section

Enclosure

cc: Barbara Zellmer, WDNR
Ed Lynch, WDNR
Dave Edwards, WDNR

bcc: Compliance file

S:TRAVIS:SG:09/02/91:disk #1 RADER/Filename:BUWMARDT2

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA INFRACTION BRANCH (RED)			
TYPE	AUTH	TL/TIN	M/N/I
		TECH	MM/ON
	CHIEF	TECH	TECH

GENTS/TRANS

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Wells Manufacturing Corp. - Electronics Div.
 U.S. EPA ID No.: UEP980974677
 Street: 385 Rolling Meadow Dr.
 City: Fond du Lac State: WI Zip: 54935
 Telephone: 414 922-5900

Inspection Date: 6/25/91 Time: 10:30 AM
 Weather Conditions: clear 20°

Name: David S. Edwards/DOE Agency/Title: 414 485-3044
 Inspections:

Facility Representatives:

Mike Basenhard/Wells Mfg Co 414 922-5900

See Appendix B to determine which of the following LDR waste categories the facility manages:

Generate	Transport	Treat	Store	Dispose
FO01-FO05 Solvents	✓	—	—	—
FO20-FO23	—	—	—	—
and FO26-FU28	—	—	—	—
California List *	—	—	—	—
First Third [40 CFR 268.10]	—	—	—	—
Second Third [40 CFR 268.11]	—	—	—	—
Third Third [40 CFR 268.12]	✓	—	—	—

* See Appendix A

GENTSD/TRANS

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

Flux
~~Filter~~ Methanol Alcohols

LDR Waste Management:

Flux (D001) shipped to Milw Solvent + Chem.
Fermentation
Methanol Alcohol (F203) shipped to
Safety Kleen

Summary:

Signature: *D.J. Smith*

Revised 09/90

GENTSYTRANS

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility has listed in each of the following LDR categories*

- | | |
|----|--|
| 1. | F001 through F005 spent solvents:
<u>F003</u> |
| 2. | F006-F023 and F026-F028 disinfectant wastes |
| 3. | California List Wastes (See Appendix A) |
| 4. | First Third Wastes [40 CFR 268.10]: |
| 5. | Second Third Wastes [40 CFR 268.11]: |
| 6. | Third Third Wastes [40 CFR 268.12]**:
<u>D CO</u> |

*See Appendix G.
**Waste Effect: 0922.700, Large quantity generators and TSDFs are required to use the toxicity characteristic leaching procedure (TCLP). The use of the TCLP for determining the toxicity characteristics of F/F wastes will result in a new regulation. But until such time, wastes which satisfy the F/F wastes classification will be considered as newly identified wastes. After March 26, 1991, they will be evaluated under the CERCLA hazard classification. If they are characterized as F/F wastes, they will be evaluated under the IP toxicity characteristic [40 CFR 263.12].

III. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268? *

Yes No

If no, list below:

Assigned Classification

Correct Classification

*Areas of concern include: California List wastes categories with more stringent treatment standards; listed characteristic; multi-source/strategic-source (source p and u wastes); and X-wastes; and waste code carry-through principle.

Comments: _____

GENTSDTRANS

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(f)]
- Yes _____ No _____ NA _____
- Comments _____
-
3. Has multi-source leachate been assigned the F139 waste code? [40 CFR 261.3]
- Yes _____ No _____ NA _____
- "Leachate derived sequentially from F006, K023, K024, P025, P026 wastes retains the individual waste codes."*
- If Yes, was single-source leachate combined to form multi-source leachate? [40 CFR 262(3)]
- Yes _____ No _____
- Comments _____
-
- C. Does the facility handle the following wastes (national capacity variances)?*
1. F001, F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]
- Yes _____ No _____ List _____
-
2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]
- Yes _____ No _____ List _____
-
3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(7)]
- Yes _____ No _____ List _____
-
4. K008, K015 petroleum wastes (now wastewater). expires - 11/08/90. [40 CFR 268.35(b)]
- Yes _____ No _____ List _____
-
5. Soil and debris contaminated with wastes that had treatment standards based on interim status in the Second Third rule - F010, F024, K008, K010, K011, K013, K014, K023, K027, K028, K029, K030, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P044, P062, P071, P083, P089, P094, P097, P106, P111, U028, U038, U058, U069, U087, U098, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(g)]
- Yes _____ No _____ List _____

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6. Soil and debris contaminated with wastes that had treatment standards set in the Third/Third rule based on incineration, mercury retorting, or vitrification. See Appendix A, [expires - 05/08/92]. [40 CFR 268.35(e)]

Yes No ✓List

The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P026, P038, P065, P087, P092, U136, U151. [expires - 05/08/92]. [40 CFR 268.35(c)]

Yes No ✓List

The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), 2009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes No ✓List

Inorganic solid debris as defined in 40 CFR 268.2(e)*, includes chromite refractory bricks carrying EPA Hazardous Waste Nos. K048, K052 (expires - 05/08/92); [40 CFR 268.35(e)]

Yes No ✓List

*Note: Incorrect reference (to CFR 268.2(e)) in this third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes No ✓List

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes No ✓List

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this sentence in the Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

Note: This information is generally available on the manifest or other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes No NA

If available, list each waste code and check the correct treatability group:

Waste Code	Wastewater*	Nonwastewater
F003	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>

*Note: Total % by weight total organic carbon (TOC), or less than 15% by weight total volatile halogenated solvents (VHSS) listed in 40 CFR 266.41, Table C-11(a)

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes No NA

If yes, list each waste code and check the correct treatability group:

Waste Code	Wastewater*	Nonwastewater
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>

Comments _____

*Note: Total TOC by weight and less than 15% suspended solids (TSS) by weight.
(40 CFR 266.41(f))

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes No NA

If available, list each waste code and check the correct treatability group:

Waste Code Substrate Wastewater* Nonwastewater

D001

* Less than 1% by weight and less than 5% total suspended solids (TSS) with the following exceptions: X010, X015, and X016 wastewater - less than 5% by weight TOC and less than 1% by weight TOC; X105 and X110 wastewater - less than 5% by weight TOC and less than 1% by weight TSC. (40 CFR 268.24(f)(2) and (3))

Comments:

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]
- Yes No NA
- c. Does the generator specify alternative treatment standards for lab packs?*
- Yes No NA

*Use of the alternative treatment standards is not required. (CS # 22639)

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(e)(2)]

- Organometallics: All Part 268, Appendix IV constituents
 — Organics: 40 CFR Part 268, Appendix V constituents

~~unregulated wastes and hazardous wastes which meet treatment standards may be categorized in the appropriate Appendix (e.g. V 15 pack, (B) F 242F)}~~

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

- Yes No NA

*Use of the alternative treatment standards is required. (CS # 22639)

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm

- Yes No NA

If yes, check the appropriate treatability group:

- 50 to 500 ppm PCBs
 ≥ 500 ppm PCBs

GEN

b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes No NA

If yes, check the appropriate treatability group:

2. Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
— All other HOCs greater than or equal to the prohibited level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain(s) ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes No NA

National Capacity Variance Wastes: Has all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes No NA

If a waste stream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes No NA

If California List prohibitions apply to waste streams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date

Comments _____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes No NA

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

White Code Required Technology Alternative Method Approval

Comments _____

3. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes _____ No

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.4(b) and 268.45(l)]

Yes _____ No

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes No _____

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level, no effect.

If no, does the generator ship all restricted wastes as not exceeding treatment standards?

Yes _____ No

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "no" answer to applicable question b, through d, does not necessarily constitute a violation; however, knowledge of waste is merely sufficient if a generator certifies that treatment standards it uses have been met.

b. Knowledge of waste:

Yes No

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(f)(3)]

c. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/finalization technology)

Yes _____ No NA _____

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I); **EPA Test Method 1317; ***Appendix C for exemptions; ****A demonstration available * technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of first test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruent/removal technology)

Yes No NA

*See Appendix C for exception.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- d. PFLT*: Was PFLT used to determine if California List constituents were contained in liquid/hazardous waste?

Yes No NA

*PFLT = Priority Filter Liquid Test (Test Method 9005, EPA Publication #, 98-54)

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 263.34 (permissible in some states)?

Yes No (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes No

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? [40 CFR 268.7(a)(4)]

Yes No (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(c)]

- Based on a detailed chemical and physical analysis of a representative sample
- Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

GEN

Has the plan been filed with the Regional Administrator [return receipt, Federal Express slip, etc., required for verification]? [40 CFR 268.7(a)(4)(ii)]

Yes No

Comments _____

4. Dilutee Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix I for distinction between restricted and prohibited wastes.

Yes

No

(If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22660]

Yes

No

A

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22660-22666]

Yes

No

(If No, go to c.)

Check appropriate category:

— Dilutes to meet treatment standards

— Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

Managed in treatment systems regulated under the Clean Water Act

— Non-toxic* characteristic wastes

— Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic wastes include non-hazardous, non-radioactive, and non-toxic except spans dermally or orally. [55 FR 22663]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(i)]

Yes

No

Comments _____

5. FQ09 Multi-source leachate: Has the generator part an initial analysis [for all constituents of concern in 40 CFR 268.41 and 268.43? [45 FR 22620]

Yes No NA

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in § RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes No ✓

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/yr, but less than 1,000 kg/yr, hazardous waste, or less than 1 % spec. equally hazardous waste.

Comments _____

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: The determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22602]

Yes No NA ✓

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met? [40 CFR 268.9(d)]

Yes No NA ✓

*This applies to both construction based [construction standard specified in 40 CFR 268.41 and 268.43] and to sites of the [2] required records which result in treatment below the characteristic level. See Appendix G.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards (prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes No ✓ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

GEN

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes No (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packts, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes No NA

b. Is a notification sent with each waste shipment?

Yes ✓ No

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes No (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code Subsequent Handler

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes No

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to off-site disposal facility?

Yes No (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code Receiving Facility

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(e)(2)(i)]?

Yes No (If No, go to 4.)

GEN

b. Are a notification and a certification sent with each waste shipment?

Yes No

If no is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes No (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Subsequent Handler _____

Waste Code _____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first-waste shipment subject to the tolling agreement? [40 CFR 268.75(q)(9)]

Yes No

Are characteristic wastes which have been rendered non-hazardous [in a RCRA exempt unit] shipped to a Subtitle D facility?

Yes No NA (If No or NA, go to 4.)

Complete the following table:

Waste Code _____ Receiving Facility _____

Waste Code _____ Receiving Facility _____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(q)(1) and 268.7(b)(5)?]

Yes No

Off-Site Management: Wastes Subject to Variances, Extensions, or Permits

g. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes No (If No, go to 5.)

Complete the following table:

Waste Code _____ Receiving Facility _____

Waste Code _____ Receiving Facility _____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes _____ No _____

b. Is a notification sent with each waste shipment?

Yes _____ No _____

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) [small quantity generator only]? _____

Yes _____ No _____ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code: _____ Subsequent Handler: _____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(e)(3)]

Yes _____ No _____

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes _____ No _____

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes _____ No _____ NA _____

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes _____ No _____ NA _____

*See Appendix G. Note that the soft hammer provision took effect 48 of 06/06/90. Soft hammer wastes which had treatment standards established in the Third Title rule were granted a minimum 10-day material consistency variance to 06/06/90.

Comments _____

- ## Treatment Using RCKA 40 CFR Parts 264 and 265 Exempt Units or Processes

Are restricted wastes treated in RCRA exempt units [i.e., boilers, furnaces,

Are reticulated wastes treated in R/CRA, Example 1000 [i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.]?

No _____
Yes _____
TLL NGOs do not compromise their mission).

List types of waste in treatment units and processes

Waste Code	Type of Treatment	Treatment Units and Processes
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Are treatment residuals reportable from these units?

Comments _____

- All trademarks, registered trademarks, service marks, and trade names used herein belong to their respective owners.

—VAN—

11 JUNE 1995

Additional Comments, Concerns, or Issues Not Addressed in the Checklist

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTES

TO: SAFETY-MEED CORP
633 EAST 120TH ST
DOLTON IL 60419

EPA ID No.: IL0160613B13

Under manifest number IL-510847, line number 11-a - September 11a, 11b, 11c, or 11d the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the wastes is restricted and the EPA waste type and the appropriate minimum standards are as follows:

EPA Waste Type: #003

RESTRICTED CONSTITUENTS	TREATMENT STANDARDS (mg/L)			
	Wastewater with Solvents	All Other Solvent Wastes	Check All That Apply	
Acetone	0.06	0.60		
m-Butoyl acetate	0.0	0.0		
Carbon tetrachloride	1.05	4.81		
Chlorobenzene	0.03	0.96		
Cresols (and α -naphthoic acid)	0.15	0.05		
Cyclohexane	2.62	0.75		
1,2-dichloroethane	0.125	0.75		
Dimethyl acetate	0.88	0.125		
Ethyl benzene	0.05	0.75		
Ethyl ether	0.05	0.05		
Isobutane	0.05	0.75		
Methanol	3.0	8.0		
Methylene chloride	0.45	0.75		
Methoxane chlorinated (from pharmaceutical industry)	0.20	0.50		
Methyl ethyl ketone	(2-7)	0.90		
Methyl isobutyl ketone	0.05	0.75		
Nitrobenzene	0.05	0.20		
Pyridine	1.46	0.125		
Tar kettone/styrene	1.12	0.50		
Toluene	0.079	0.05		
1,1,1-Trichloroethane	1.12	0.30		
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.41		
Trichloroethane	1.06	0.98		
Xylene	0.05	0.15		
Halogenated Organic Compounds	1000.0	1000.0		
Pive Camphor	1000.0	1000.0		
Aromatic Oils	500.0	500.0		
Cadmium (Cd)	100.0	100.0		
Chromium (Cr-V)	800.0	800.0		
Led (Pb)	500.0	500.0		
Mercury (Hg)	20.0	20.0		
Nickel (Ni)	134.0	134.0		
Selenium (Se)	100.0	100.0		
Thallium (Tl)	130.0	130.0		

Generator Name: WELLS MFG ELECT DIV

EPA ID: NY096995177

Generator Representative Signature: Jeff Feldman

Date: 09/09/2003

Name & Title of Representative: Jeff Feldman

Date: 09/09/2003

Site Sample Number: 100000

Date: 09/09/2003

Control #: 0005971

Date: 09/09/2003

P-2-1
6-5-71



March 5, 1991.

2100 Badger Rd
P.O. Box 170
Raukutta, MI 54130

Well's Manufacturing
Attn: Jeff Fellers
385 Rolling Meadows Drive
P.O. Box 70
Fond du Lac, WI 54935

Dear Jeff:

Based upon the above referenced sample, your material is acceptable for Safety-Kleen's Fluid Recovery service Program. This material has been classified as follows:

US DOT Description Proper Shipping Name: RQ Waste Isopropanol
Hazardous Class: Flammable Liquid UN1219
EPA Hazardous Waste Number:
Service interval:
Price:
Pressure Release bung's = \$5.95 each
Scheduled: \$185.00/Drum
Unscheduled: \$225.00/Drum

Dest Facility EPA Number:
Dest Facility State ID Number:
Illinois Authorization Number:

TLD980613913
0310690006
000161

Products not conforming to the present analysis will be subject to return if the materials are unsafe or unsuitable for Safety-Kleen's TRS Program. (See attached acceptability list.) Materials which must be returned will be subject to a freight and handling charge of \$150.00 per drum.

Very truly yours,

Tim Silvius
Branch Industrial Manager

VP

CLINICAL: VANDORO 172
SAMPLE #: 123524

ACCEP T

5
safetypKleen

FLUID RECOVERY

NO ATTACHMENT

* * REVISED * *

CUSTOMER INFORMATION:

WELL'S MFG ELECT DIV
385 ROLLING MEADOWS DR
FONDULAC MI 54936

PO BOX 70
FONDULAC
MI 54936

BILLING ADDRESS:

ATTN: JEFF FELLES

BRANCH: 31700 GILL MORSES	COMMODITY: FONDULAC
NATURE OF BUSINESS: ELECTRONIC COMPONENTS AUTO	
FEDERAL EPA ID: WIDH98677 STATE EPA: ID	SIC: J-3894
MANIFEST ADDRESS IS FACILITY	MANIFEST TO SAFETY-KLEEN
MATERIAL FLUX	PROCESS: SOLDIER MACHINE
VOLUME: 110 GALS PER SWANSON	VOLUME ON HAND: 110
STORAGE CAPACITY: 220 LBS DRUMS	SHIPPING FREQUENCY: 110L
CONTAINER: DRUM	PHYSICAL STATE: LIQUID
LAYERS: ONE	CODE: KPA
NON-VOLATILE SUBSTANCES: PROPYL ALCOHOL, 130-	NAME: MAX TROPICAL
ETHYL ALCOHOL, BUTYL ETHER	0.0
WATER	0.0
RESTRICTED SUBSTANCES: NONE	0.0
D.O.T. HAZARDOUS MATERIAL: CUSTOMER REQUEST ASSISTANCE	0.0
EPA HAZARDOUS WASTE: CUSTOMER REQUEST ASSISTANCE	0.0
TYPE OF CONTACT: F.O.	STANARD: STB01
CONTACT: JEFF FELLES	TITLE: SALESREP
SERVICE COMMENT: L-1688-3	PHONE: 414-923-5020
CORPORATE REVIEW: DISPOSITION: REVIEWER DATE	
TECHNICAL: REGULATORY: OPERATIONAL:	02/14/91
ACCEPT: AAO	02/14/91
APPROVED FACILITIES:	
16881 SAFETY-KLEEN CORP	(694) 546-1200
STATE: MI	829 EAST 128TH ST
NEW CASTLE KT 40100	COLDON IL 60218
FED EPA#:	110400161912
STATE EPA#:	0310490006
TELEPHONE: 502/845-2489	708/48-4450
TEL. AUTH#:	0001611
APPROVING DOCS/102 DRUM	EPA WASTE CODES
DO/T-EPA 80 WASTE ISOPROPANOL	DOCS:
08001 SLAMMABLE LIQUID UN1219	1000-11000, F20
COMMENTS: OK FOR FUEL, TPS PART 02101.	1122-A79

THIS SERVES AS NOTICE PER, 40CFR264.12(b)(1), THAT THE FACILITY(IES) NOTED ABOVE HAS THE APPROPRIATE PERMITS AND IS WILLING TO RECEIVE THE MATERIAL DESCRIBED.

-271 (RUN 02/27/91)

SAFETY-KLEEN CORP.
PREQUALIFICATION EVALUATION
MATERIAL ANALYSIS

REVISED : 03/27/91
CONTROL #: 008591-4
SAMPLE #: 135521

* * REVISED * *

FLUID RECORDER

WEBS MEQ SELECT DIV

** F L U I D R E C O V E R Y **

ACCEPT
NO ATTACHMENT

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR: YELLOW
WATER CONTENT: 2.1 WTS.
NON-VOLATILE RESIDUE: 92.3 WTS. DESCRIPTION: OIL
FLAMMABILITY: FLASHED AT 140° F BY SPILLFLASH
FLAMMABILITY: FLASHED AT 100° F BY SPILLFLASH
PH: 7.42 WTS. OR 24.2 GRAMS
NEUTRALIZATION: ACTIVITY AS HCl
RADIOACTIVITY: 3. NONE DETECTED

FUEL EVALUATION OF TOTAL SAMPLE

HEAT CONTENT:	1200 BTU/LB	DESCRIPTION:	ASH UPON COMBUSTION: 4.0 WTS.
TOTAL CHLORINE:	1.2 WTS.		TOTAL SODIUM: 0.1 WTS.
TOTAL FLUORINE:	0.1 WTS.		TOTAL SULFUR: 0.1 WTS.

GENERAL COMPOSITION:

SPECIFIC GRAVITY	VISCOSEITY (CENTIPOISE)	GENERAL COMPOSITION BY APPEARANCE TOTAL
		(WTS.) (WTS.)
AQUEOUS PHASE (FREE WATER):		0.0 0.0
BIOLOGIC PHASE (FROTHBACK):		100.0 100.0
BOTTOM SLUDGE (EMULSIONS):		0.0 0.0
BOTTOM SOLID (SETTLED SEDIMENT):		0.0 0.0

TOTAL: 90.0 < 50.0 CPS 100.0 100.0

SPECIFIC COMPOSITION OF TOTAL SAMPLE

WATER CONTENT	DESCRIPTION: OIL	COMPOSITION OF: TOTAL
NON-VOLATILE RESIDUE		SAMPLE (WTS.)
VOLATILE ORGANICS BY DIFFERENCE		2.1 2.1
TOTAL		73.2 73.2

VOLATILE ORGANIC COMPOSITION OF TOTAL SAMPLE BY GAS CHROMATOGRAPHY

SAMPLE PREPARATION METHODS: HEAD

DETECTION METHODS: FID, PID

COMPOSITION OF:	VOLATILE ORGANICS (WTS.)	COMPOSITION OF:	VOLATILE ORGANICS (WTS.)
CODE GAS NUMBER	(WTS.)	CODE GAS NUMBER	(WTS.)
TPA	07-03-0	TPA	75.1 19.3
STYRENE GLYCIDE BUTYL ETHER	0086	111-73-2	22.7 5.5
ETHYL ALCOHOL	84-17-0	84-17-0	1.7 0.4
TOTAL OTHERS (<1% EACH)	0-09-6	TO	0.5 0.1

TOTAL: 100.0 100.0 25.4

SUMMARY OF VOLATILE ORGANIC COMPOSITION BY COMPOUND CHEMICAL CLASS WTS.

ALCOHOLS	AROMATIC HYDROCARBONS	ALIPHATIC HYDROCARBONS
ESTERS	STYRENE GLYCIDE BUTYL ETHER	CHLORINATED SOLVENTS
GLYCOL ETHERS	TOTAL OTHERS	ETHERS
KETONES	POLYCHLORINATED BIPHENYLS (PCBs)	NITROGEN COMPOUNDS

SPECIFIC ORGANIC COMPOSITION

PCBs: NONE DETECTED <

4211 (REV 03/27/81)

SAFETY-KLEEN CORP.
QUALIFICATION EVALUATION
MATERIAL ANALYSIS

* * REVISED * *

FLUID RECOVERY
HELLS WFG SELECT DIV

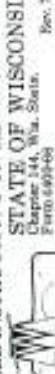
* * # FLUID RECOVERY *

EXAMINER REVIEWED:	TEST CODES:	RELEASED:	TRACKING INFORMATION:
LEVEL:	TEST CODES:	02/14/81	DATE - FACILITY
LAB REVIEWERS:	GIL GIL	ANALYZED: 02/13/81	SURVEY RECEIVED: 02/06/81 SK TECHNICAL CEN
HR ESTIMATED BY DIFFERENCE:			SAMPLE RECEIVED: 02/06/81
			RESAMPLE RECEIVED:

THE ANALYSES CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN IN ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

REVISION NOTES: ** (02/06/81) **
(02/06/81) CHANGED TO ACCEPT AG
NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED UNDER 40 CFR PART 268.
EPA WASTE CODES FOR LHM DO NOT
ANALYSIS DOES NOT INDICATE THAT MATERIAL IS CALIFORNIA LIST HALOGENATED ORGANIC COMPOUND WASTE.

SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.



STATE OF WISCONSIN
Chamber 144, Wis., Sheet
Form 609-048
Rev. 4-87

State of Wisconsin
Department of Natural Resources
Bureau of Solid Waste Mgt.
Box 8904
Madison, Wisconsin 53708

Please print or type. Form designed for use on side [12-pitch] typewriter.

Form Approved, DMN No. 2510/074, Expires 10-30-96

FOR DMR USE ONLY

GENERATOR'S CERTIFICATION

NOTE: If you are a generator of a restricted waste, a copy of this notice must accompany each shipment in accordance with 40 CFR 268.7 (a)(2).

If a generator determines that he is managing a restricted waste under this part and the waste exceeds the applicable treatment standards, with each shipment of waste the generator must notify the treatment facility in writing of the appropriate treatment standard set forth in 40 CFR 268 Subpart D or this part.

Please check the appropriate box if applicable:

SUBPART D - TREATMENT STANDARDS

Source Concentration	Wastewater Treatment Standard (mg/L)	Groundwater Treatment Standard (mg/L)
Acidic effluent	5.4	3.6
Acidic leachate	1.0	0.4
Cadmium	8.0	8.0
Chromium	8.0	8.0
Copper	1.0	0.15
Mercury	1.0	0.15
Pesticide residues	0.15	0.15
U-238 radium	0.45	0.15
Uranium	-	0.15
Volatile	0.05	0.05
Yttrium	0.2	0.2
Zinc	0.15	0.15
Antimony residues	0.10	0.05
Chlorine chloride from pharmaceutical industry	0.1	0.05
Chloro and Bromo	0.05	0.05
Fluoride (other) residuals	0.05	0.05
Stibium	0.04	0.05
Thallium	0.10	0.10
Thiobacillus	0.05	0.05
Uranium	0.10	0.05
U-234 radium	0.05	0.05
U-235 residues	0.05	0.05
U-236 radon	0.05	0.05
U-238 radon	0.05	0.05
Uranium	0.05	0.05
U-235	0.05	0.05
All other efflu	-	-

In addition, the following information must be provided:

EPA Hazardous Waste Number D005
Manifest Number Associated With This Shipment WJG-C 3272
Waste Analysis Data Where Available (Please attach)

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

John Stoller
Signature

John Stoller
Title

Office Use Only
LN _____

3-25-91
Date

P-14 65-71
B



JULY 24, 1990

2100 Badger Rd.
P.O. Box 170
Raukauna, WI 54130

Well's MFG Elect. Div.
Attn: Jeff Peillers
385 Rolling Meadows Drive
P.O. Box 70
Fond du Lac, WI 54936

Dear Jeff:

Based upon the above referenced sample, your material is acceptable for Safety Kleen's Fluid Recovery Service Program. This material has been classified as follows:

US DOT Description Proper Shipping Name:	HQ Waste Compound Cleaning Liquid
Hazardous Class:	Combustible Liquid NA 1993
EPA Hazardous Waste Number:	F003/F001
Service Interval:	6 Week
Price:	Scheduled: \$330.00/drum Unscheduled: \$365.00/drum
Illinois Authorization Number:	000161
Dest. Facility EPA Number:	TID 9800613913
Dest. Facility State ID Number:	0310690006

Products not conforming to the pre shipment analysis will be subject to return if the materials are unsafe or unsuitable for Safety Kleen's FRS Program. (See attached Acceptability List.) Materials which must be returned will be subject to a freight and handling charge of \$150 per drum.

Very truly yours,

Tim Sivius

Branch Industrial Manager
VP

A 07/18/90

PREGALFICATION EVALUATION

CUSTOMER SURVEY

PAGE 1 OF 2
COMPLETE: 07/18/90
CONTROL #: 005897-8
SAMPLE #: 100002



O RECOVERY
* * FLUID RECOVERY *

STOWER INFORMATION:
* * * * *

WELL'S MFG ELECT DIV
385 ROLLING MEADOWS DR
FONDULAC WI 54936
PO BOX 70
FONDULAC
WI 54936

ATTN: JEFF FELLERS

BRANCH: MUSON BILL MORRIS
NATURE OF BUSINESS: ELECTRONIC COMPONENTS AUTO
FEDERAL EPA ID: WIDB00001 STATE EPA: ID
MANUFACTURER ADDRESS: FACILITY
MANUFACTURER: TO SAFETY-KLEEN SIC: 3594
INDUSTRIAL FEDOR: PEOIN
VOLUME: 15 GALS PER YEAR
STORAGE CAPACITY: 35 IN COLUMNS
COLOR: BROWN
MATERIAL COMPOSITION(WORD):
FRESH TWS
NON-VOLATILE RESIDUE
RESTRICTED SUBSTANCES: NONE
D.O.T. HAZARDOUS MATERIAL: CUSTOMER REQUEST ASSISTANCE
EPA HAZARDOUS WASTE: CUSTOMER REQUEST ASSISTANCE

TYPE OF SAMPLE: COMPOSITE
NUMBER OF ORIGINS SAMPLED: 1
TITLE: SUPPLY
DISPOSER/RECYCLER: JEFF FELLERS
TECHNICAL: DATE
REGULATORY: ACCEPT CAF 07/18/90
OPERATING: ACCEPT GUF 07/18/90
APPROVED FACILITY: APPROVED
OPERATOR: USE 07/18/90

(054) SAFETY-KLEEN CORP (054) SAFETY-KLEEN CORP
STATE: NY 146 STATE: KY 40050
NEW CASTLE KY 40050 620 EAST 138TH ST
FED EPA#: KY0063448108 001794 IL 40418
STATE EPA#: 0310900005 110190013913
TELEPHONE: 502/849-2453 0310900006
IL. AUTH#:
000161

APPROVED CODE1150 DRUM OR BULK
DOT/EPA: 80 WASTE COMPOUND, CLEANING LIQUID
DESC: COMBUSTIBLE LIQUID NA 1993
COMMENTS: C-001 (SIC# 27)
OK FOR OFF-SPEC FUEL PBS CAT II.

DATE: 07/21/90
TAKEN BY: SALESREP
PHONE: 415-922-8920
PRICING CODE: F2

ADDITIONAL
EPA NO(3):
FOO:1

THIS SERVES AS NOTICE PER 40CFR264.52(b) THAT THE FACILITY(IES) NOTED ABOVE
HAS THE APPROPRIATE PERMITS AND IS WILLING TO RECEIVE THE MATERIAL DESCRIBED.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Carol D. Barnaby, Secretary
Horicon Area Headquarters
1270 N. Milwaukee Street
Milwaukee, WI 53202

June 12, 1991

FNR Ref. 4430

Mr. Mike Baumbardt, Senior Hfg Technician,
Wells Manufacturing Corp.,
P.O. Box 70
Fond du Lac, WI 54935

Subject: NOTICE OF NONCOMPLIANCE, Wells Manufacturing Corp.,
Electronics Division, EPA I.D. #4110980994677, Fond du Lac
County

Dear Mr. Baumbardt:

On June 5, 1991, a hazardous waste compliance evaluation inspection was conducted at Wells Manufacturing Corp., Electronics Division. At the time of the inspection, violations to NR 600 Wis. Adm. Code were noted. The violations are the subject of this Notice of Noncompliance.

The following violations were noted during the inspection:

1. Weekly inspection logs, which includes the date and time of inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions were not maintained. [NR 610.08(1)(a)(2)].

2. Inspection log summaries were not maintained for the on-site recycling operation [NR 630.15(4)].

As a small quantity generator, you are responsible to insure employees are properly trained and thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities.

Within sixty days from the date of this letter, the following must be accomplished:

1. A weekly inspection log must be established.
2. An inspection and operating log summary must be established for the recycling unit.

Mr. Mike Barnhardt

2

Enclosed are examples of inspection logs and operating log summaries.

The facility was also evaluated for compliance with Land Disposal Restriction requirements. Information that was obtained during the inspection has been forwarded to the Environmental Protection Agency for review.

Please notify me when the violations have been adequately addressed. In the meantime, questions can be directed to me at (414) 485-3015 or 529-3349 from Pond du Lac.

Sincerely,



David S. Edwards
Environmental Specialist
Solid & Hazardous Waste Management

cc Andy Techaps, U.S. EPA

SD

HW-SW/3